

AUG 23 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. T.E. Will  
Director of Plant Engineering  
GMC-BOC Lordstown Assembly  
P.O. Box 1406  
Warren, Ohio 44482

Re: Notice of Violation  
GMC-BOC Lordstown Assembly  
OHD 020 632 998

Dear Mr. Will:

On April 26, 1988, the Ohio Environmental Protection Agency (OEPA) representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions. The land disposal restrictions became effective on November 8, 1986, (reference Federal Register 40636: 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270).

With respect to the land disposal requirements section of the inspection, your facility was found to be in violation of certain land disposal requirements as noted below:

1. Failure as a generator to make an appropriate hazardous waste determination as required by Section 262.11. Specifically, this refers to the concentrations of nickel in the California waste your facility manages;
2. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13;
3. Failure to notify in writing for each shipment of restricted wastes as required by Section 268.7(a)(1);

4. Failure as an owner/operator to provide proof that storage of restricted waste for more than one (1) year was solely for the purpose of accumulation of such quantities of hazardous waste are necessary to facilitate proper recovery, treatment, or disposal as required by Section 268.50(c);
5. Failure to maintain a complete operating record to include 40 CFR Part 268 requirements in accordance with Section 265.73; and
6. Failure to identify contents and mark dates on all containers entering storage, as required by Section 268.50(a)(2)i).

Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure further compliance. Failure to correct the violation(s) may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Catherine McCord of my staff at (312) 886-4436.

Sincerely yours,

James J. Brossman, Chief  
OH/MN Technical Enforcement Section

cc: Michael Savage, OEPA-CO  
Sheryl Slone, OEPA-NEDO

5HR-12:KOGLE:fharris:6-1478:8/1/88

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	TYP.	AUTH.	IL TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	W. Dir
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